

ESTTA Tracking number: **ESTTA707881**

Filing date: **11/11/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	92059235
Applicant	Plaintiff Nite Ize, Inc.
Other Party	Defendant Zhangwei Mo
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 11/12/2015. Nite Ize, Inc. requests that such date be extended for 30 days, or until 12/12/2015, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	11/12/2015
Discovery Closes :	12/12/2015
Plaintiff's Pretrial Disclosures :	01/26/2016
Plaintiff's 30-day Trial Period Ends :	03/11/2016
Defendant's Pretrial Disclosures :	03/26/2016
Defendant's 30-day Trial Period Ends :	05/10/2016
Plaintiff's Rebuttal Disclosures :	05/25/2016
Plaintiff's 15-day Rebuttal Period Ends :	06/24/2016

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Nite Ize, Inc. has secured the express consent of all other parties to this proceeding for the extension and re-setting of dates requested herein.

Nite Ize, Inc. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,  
/Robert P. Ziemian/

Robert P. Ziemian  
robert.ziemian@haynesboone.com  
jh@mg-ip.com  
11/11/2015